IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE **GREENEVILLE DIVISION**

JERRY MICHAEL PUCKETT, **ANDREW JOSEPH PUCKETT, and** G.R.P., a minor child,

Plaintiffs,

Case No.: 2:23-cv-00123-DCLC-CRW

٧.

UNICOI COUNTY, TENNESSEE, **CITY OF ERWIN, TENNESSEE,** MICHAEL HENSLEY, JONATHAN "FRANK" ROGERS, TONY BUCHANAN, AND **JOHN AND JANE DOES NO. 1-10**

Defendants.

MOTION TO DISMISS/MOTION FOR MORE DEFINITE STATEMENT

Come now Defendants, Unicoi County, Tennessee, Michael Hensley and Jonathan "Frank" Rogers, by and through undersigned counsel, and respectfully move the Court pursuant to Rule 12 of the Federal Rules of Civil Procedure, for the entry of an Order dismissing Plaintiffs' action, or in the alternative, requesting Plaintiffs file an additional complaint as a result of the initiating complaint filed September 7, 2023, requires a more definite statement under the Federal Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this 7th day of December, 2023.

TAYLOR & KNIGHT, GP

s/ Arthur F. Knight, III Arthur F. Knight, III, BPR# 016178 800 South Gay Street, Suite 600 Knoxville, TN 37929 Phone: 865-971-1701

Fax: 865-971-1705

CERTIFICATE OF SERVICE

I hereby certify that on December 7th, 2023, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. The Plaintiffs will be served via regular U.S. Mail at the following address:

Jerry Michael Puckett 775 Rector Laurel Road Flag Pond, TN 37657

Andrew Joseph Puckett 775 Rector Laurel Road Flag Pond, TN 37657

G.R.P. 775 Rector Laurel Road Flag Pond, TN 37657

Parties may access this filing through the Court's electronic filing system.

<u>s/Arthur F. Knight, III</u> Arthur F. Knight, III